

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA**

CHARLESTON DIVISION

**IN RE: ETHICON, INC.
PELVIC REPAIR SYSTEMS
PRODUCTS LIABILITY LITIGATION**

MDL 2327

THIS DOCUMENT RELATES TO THE CIVIL ACTION NOS. LISTED ON THE ATTACHED EXHIBIT:

**JOINT MOTION TO DISMISS DEFENDANT
BOSTON SCIENTIFIC CORP. WITH PREJUDICE**

Plaintiffs in this case (listed on the attached Exhibit A) and defendant Boston Scientific Corporation (“BSC”) advise the Court that they have compromised and settled all claims between them in this action, including all counterclaims, cross-claims and third-party claims. Accordingly, Plaintiffs and BSC jointly move the Court to dismiss BSC only as a defendant in this action with prejudice and terminate BSC from the docket of the Court in this action, each party to bear its own costs. Other defendants remain in this action and plaintiffs will continue to prosecute their actions against them.

Dated January 24, 2017

Respectfully submitted,

By: /s/ Jon A. Strongman
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COUNSEL FOR PLAINTIFF

CERTIFICATE OF SERVICE

I hereby certify that on January 24, 2017, I electronically filed the foregoing with the Clerk using the CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in the member cases.

By: /s/ Jon A. Strongman
Robert T. Adams – MO Bar #: 34612
Jon A. Strongman – MO Bar #: 53995
SHOOK, HARDY & BACON L.L.P.

**COUNSEL FOR DEFENDANT
BOSTON SCIENTIFIC CORP.**

EXHIBIT A

CASE NUMBER	CASE NAME
13-cv-15716	GUTIERREZ, Wanda and Ramiro Gutierrez vs. Ethicon, Inc., Ethicon, LLC, Johnson & Johnson, Boston Scientific Corporation